

1 **MWCN**
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8 Attorney for Plaintiff

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 DONALD HUMES,
13
14 Plaintiff,

CASE NO.: 2:17-cv-01778-JAD-PAL

15 vs.

16 ACUIITY, A MUTUAL INSURANCE
17 COMPANY, a foreign corporation;
18 DOES 1 through 10; and ROE CORPORATIONS 1
19 through 10, inclusive,

**MOTION AND PROPOSED ORDER TO
WITHDRAWAL AS COUNSEL**

20 Defendants.

21 DANE M. WATSON, Esq., respectfully moves this court for an order permitting Dane M.
22 Watson, Esq. ("Mr. Watson"), who has not appeared in these proceedings, to withdraw as counsel
23 for Plaintiff DONALD HUMES ("HUMES"), in the above captioned matter. Pursuant to N.R.P.C
24 1.16(b)(1).

25 Dated this 7th day of October, 2017.

26 DANE M. WATSON, ESQ.

27 

28 Nevada Bar No. 13982
d.watson@budgetlasvegas.com
7120 Haven St.
Las Vegas, NV 89119

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2 **DECLARATION OF DANE M. WATSON, ESQ.**

3 I, DANE M. WATSON, ESQ., pursuant to NRS 53.045, declare under penalty of perjury, as
4 follows:

- 5 1. The facts set forth in this declaration are known to me personally, or are based upon my
6 information and belief, and if called to do so, I would competently testify under oath
7 regarding the same.
8
9 2. I am was an Associate with Ganz & Hauf, but now work for Malco Enterprises of Nevada
10 Inc., as an In-House Counsel.
11
12 3. I am duly licensed to practice law in all Nevada Courts and my name was included on a
13 pleading for Plaintiff, Donald Humes.
14
15 4. As counsel, I request withdrawal from representing Plaintiff, Donald Humes, due to the fact I
16 no longer work for the firm representing the Plaintiff.
17
18 5. This Motion is made in good faith and not for the purpose of delay.
19
20 6. Your Declarant further sayeth naught.

18 
19 DANE M. WATSON, ESQ.

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 **I. MOTION TO WITHDRAW AS COUNSEL**

22 NRPC 1.16 provides, in pertinent part:

- 23 (b) ...[A] lawyer may withdraw from representing a client if:
24
25 (1) Withdrawal can be accomplished without material adverse effect on the interests of
26 the client;

27 Here, no delay or adverse effect of any kind will result from Mr. Watson's withdrawal
28 because HUMES is represented in this matter by GANZ & HAUF. Further, Mr. Watson has not
worked on the above captioned case in any capacity. Mr. Watson did not draft any of the

1 documents related to the above captioned matter. When Mr. Watson's name was included on a
2 pleading for the Plaintiff, Mr. Watson was not admitted to practice in the United States District
3 Court, District of Nevada. Mr. Watson was admitted to practice in the United States District Court
4 on October 5, 2017. Mr. Watson is no longer employed as associate counsel at GANZ & HAUF.
5 Mr. Watson has worked as In-house counsel for Malco Enterprises of Nevada Inc., d/b/a Budget
6 Rent a Car of Las Vegas since May of 2017. Therefore, allowing Mr. Watson to withdraw as
7 counsel will not have a materially adverse effect on the interests of the Plaintiff.
8

9 **CONCLUSION**

10 For the reasons set forth above, Mr. Watson respectfully moves this Court enter an Order
11 approving the withdrawal of Mr. Watson as a representing attorney for HUMES in the instant
12 matter
13

14
15 Dated this 7 day of October, 2017.

16 DANE M. WATSON

17 

18 Nevada Bar No. 13982

19 d.watson@budgetlasvegas.com

20 7120 Haven St.

21 Las Vegas, NV 89119

22
23 **IT IS SO ORDERED:**

24 

25 **UNITED STATES MAGISTRATE JUDGE**

26 **DATED:** October 18, 2017